

AO 106 (Rev. 04/10) Application for a Search Warrant (Modified: WAWD 10-26-18)

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

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MAR 17 2020	
CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)  
Snapchat Account "squeeze10\_8",  
more fully described in Attachment A

Case No.

MJ20-5059

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

A Snapchat Account more fully described in Attachment A, incorporated herein by reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

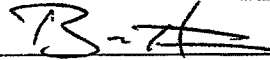
Code Section	Offense Description
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

The application is based on these facts:

- ☒ See Affidavit of FBI SA Benjamin Harrison, continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



Applicant's signature

SA Benjamin Harrison, FBI

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or  
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/17/2020



Judge's signature

City and state: Seattle, Washington

Theresa L. Fricke, United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

STATE OF WASHINGTON )  
) SS  
COUNTY OF PIERCE )

I, Benjamin Harrison, being duly sworn on oath, depose and state:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information associated with "squeeze10\_8" that is stored at premises owned, maintained, controlled, or operated by Snap, Inc. ("Snapchat"), a social-networking company headquartered in Santa Monica, California. This account will henceforth be referred to as the "SUBJECT ACCOUNT". For the reasons set forth below, the SUBJECT ACCOUNT is suspected to have been utilized by DESHAWN LAMAR WEST to communicate about his unlawful possession of firearms through various means, including posting videos and photographs of himself in possession of firearms.

2. The SUBJECT ACCOUNT to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A), to require Snap, Inc. to disclose to the government records and other information in its possession, including the contents of communications, pertaining to the subscriber or customer associated with the SUBJECT ACCOUNT.

3. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since February 2015. I am currently assigned to the Tacoma Resident Agency in the Seattle Field Office. I am Coordinator of the South Sound Gang Task Force (SSGTF). In these capacities, I have participated in multiple felony arrests and investigations. I am an "investigative or law enforcement officer of the United States"

1 within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of  
2 the United States who is empowered by law to conduct investigations of, and to make  
3 arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

4 4. I have received formal training at the FBI Academy, Quantico, Virginia.  
5 The Academy included several hundred hours of comprehensive, formalized instruction  
6 in, but not limited to, narcotics, gang and firearms investigations. While working with  
7 the SSGTF, I have attended training specific to narcotics, gang and firearms activity in  
8 Washington State.

9 5. I have also spoken to, and worked with, more experienced federal, state and  
10 municipal law enforcement agents and officers on a variety of criminal investigations.  
11 These investigations have involved the use of confidential informants, wire and physical  
12 surveillances, telephone toll analysis, investigative interviews, and the service of search  
13 and arrest warrants. I am aware that social media and communications applications are  
14 often used to aid in criminal activity, and I have reviewed Snapchat search warrant  
15 returns which contain evidence of narcotics and firearm possession and distribution, as  
16 well as gang involvement. These investigations include the unlawful possession of  
17 firearms, importation, possession with intent to distribute, and distribution of controlled  
18 substances, as well as the related laundering of monetary instruments, the conducting of  
19 monetary transactions involving the proceeds of specified unlawful activities, and  
20 conspiracies associated with criminal narcotics offenses, in violation of Title 21, United  
21 States Code, Sections 841(a)(1) and 846. As a result of my participation in these  
22 investigations, I have encountered and become familiar with the various tools, methods,  
23 trends, paraphernalia, and related articles used by gang members, those illegally  
24 possessing firearms, and narcotics traffickers and trafficking organizations in their efforts  
25 to facilitate and conceal their illegal activities.

26 6. This affidavit is made based upon my personal knowledge, training,  
27 experience and investigation, as well as upon information provided to me and my review  
28 of reports prepared by other law enforcement personnel. This affidavit is made for the

1 purpose of establishing probable cause and thus does not include each and every fact  
2 known to me concerning this investigation.

3 7. Based on my training and experience and the facts as set forth in this  
4 affidavit, there is probable cause to believe that violations of 18 U.S.C. § 922(g)(1)  
5 (Felon in Possession of Firearms) have been committed by DESHAWN LAMAR WEST.  
6 There is also probable cause to search the **SUBJECT ACCOUNT**, described in  
7 Attachment A, for evidence of these crimes and items to be seized, as listed in  
8 Attachment B.

### 10 **JURISDICTION**

11 8. This Court has jurisdiction to issue the requested warrant because it is "a  
12 court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a),  
13 (b)(1)(A), & (c)(1)(A). Specifically, the Court is "a district court of the United States . . .  
14 that has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).

### 16 **STATEMENT OF PROBABLE CAUSE**

#### 17 **A. Background of DESHAWN LAMAR WEST**

18 9. I have conducted a records check of WEST wherein I learned that he was  
19 convicted of a felony crime of Assault in the Second Degree (Count 1), pursuant to the  
20 Revised Code of Washington (RCW) 9A.36.021(1)(c), as well as a felony crime of  
21 Unlawful Possession of a Firearm in the First Degree (Count 4), pursuant to RCW  
22 9A.10.040(1)(a), both in Pierce County Superior Court under Cause No. 14-1-01971-0 on  
23 September 22, 2014. WEST was subsequently sentenced to confinement in the custody  
24 of the Washington State Department of Corrections (DOC) for 20 months on Count 1,  
25 and 48 months on Count 4, which ran concurrently.

26 10. I am aware that WEST has another prior adult felony conviction in  
27 Washington State: Assault in the Second Degree, dated on or about July 12, 2018. I am  
28 also aware that WEST has five prior juvenile felony convictions in Washington State:

1 Residential Burglary, dated on or about November 23, 2011; Residential Burglary, dated  
2 on or about March 4, 2010; Taking a Motor Vehicle Without Permission in the Second  
3 Degree, dated on or about September 05, 2007; Malicious Mischief in the Second  
4 Degree, dated on or about July 09, 2007; and, Taking a Motor Vehicle Without  
5 Permission in the Second Degree, dated on or about July 09, 2007.

6 11. WEST's criminal history of felony convictions and subsequent sentences of  
7 more than a year and one day incarceration prohibit him from lawfully possessing a  
8 firearm.

9 12. WEST is on active community supervision with the DOC, based on  
10 previous felony convictions.

11 **B. WEST's Use of Snapchat Account "squeeze10\_8"**

12 13. I am familiar with WEST'S appearance from prior investigations and by  
13 reviewing his driver's license photograph from the Washington State Department of  
14 Licensing (DOL).

15 14. Through collaboration with other law enforcement officers, I discovered  
16 WEST has a Snapchat user account of "squeeze10\_8" with display name of  
17 "CBESQUEEZE108." I have viewed recent Snapchat posts by the SUBJECT  
18 ACCOUNT and they clearly depict WEST, often while possessing what appear to be real  
19 firearms.

20 15. WEST is an aspiring rapper who posts music videos to video sharing  
21 websites like YouTube, often under the name "CBE SQUEEZE." In several videos  
22 posted by YouTube user "CBE SQUEEZE," WEST can be seen rapping. I know that  
23 "Squeeze" is a nickname WEST has used in the past. I also know that "CBE" is an  
24 acronym for "Cold Body Entertainment," which is the rap production company WEST  
25 claims to use for the production of his music.

26 16. I know from training and experience that "10-8" is a reference to the  
27 Lakewood, Washington-based 10-8 Crips gang set known to engage in gun violence and  
28 narcotics distribution, and that WEST is affiliated with the 10-8 Crips.

1 **C. WEST's Arrest on October 1, 2019**

2 17. On September 30, 2019, a series of videos were posted to the **SUBJECT**  
3 **ACCOUNT**. In the videos, WEST was riding in the back of a vehicle while holding  
4 what, based on my training and experience, appeared to be a handgun. The handgun was  
5 tan or green in color, had a black, dimpled slip on grip, a lanyard loop at the base of the  
6 magazine well, and a black extended magazine. The geolocation tag in the video said  
7 "Tacoma," and some of the videos showed WEST traveling past the distinctive structure  
8 of the Tacoma Dome.

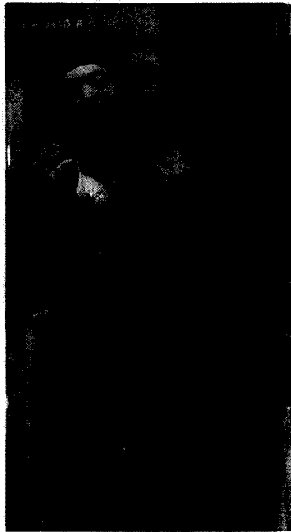
9 18. From my familiarity with WEST's appearance, it was clear to me that the  
10 person with the handgun was WEST.

11 19. On October 01, 2019, WEST was arrested on an active felony warrant near  
12 Big Sandy, Montana for failing to comply with his DOC terms of supervision. At the  
13 time of arrest, WEST was seated in the backseat of the maroon Chrysler 200 bearing  
14 Montana license plate BWC689. A subsequent search warrant executed on the Chrysler  
15 by law enforcement officers in Montana resulted in the seizure of a Glock 9mm model  
16 19X handgun, bearing serial number BHTY358, with extended magazine. The handgun  
17 appeared to match the handgun WEST was holding in Snapchat videos on September 30,  
18 2019. These comparison photographs are reproduced below, where the image on the left  
19 is the DOL photograph of WEST, the two center images are screen captures from the  
20 Snapchat videos posted on September 30, 2019, and the image on the right is the Glock  
21 handgun seized in Montana, from the vehicle that WEST was riding in.  
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**D. WEST's Arrest on February 14, 2020**

20. On the night of February 12, 2020, an image was posted to the **SUBJECT ACCOUNT** which clearly depicted WEST holding two apparent handguns. In one hand, WEST held a large framed black handgun with appropriately sized magazine inserted. In his other hand, WEST held a relatively smaller framed black handgun with black, extended magazine. Black hair ties or elastic bands were wrapped around the extended magazine. Both handguns have characteristics in common with handguns made by Glock: black polymer frame, off-black metal slide, and a chrome tab under the barrel where the gun's serial number is stamped. The shape of the magazine base plate on the extended magazine is consistent with the type of extended magazine made by Glock. A screen capture of the post is reproduced below.



21. On February 13, 2020, a search warrant was signed by Judge Jerry T. Costello, in Pierce County Superior Court, for WEST's person and residence, located at 3939 10<sup>th</sup> Street SE, Apartment E3, Puyallup, Washington. Among other items of evidentiary value, the warrant permitted law enforcement to seize firearms, ammunition, firearm paraphernalia, cell phones, and clothing worn by WEST in posts to the **SUBJECT ACCOUNT**.

22. After WEST's arrest, the SSGTF executed the search warrant for his residence. Seized from WEST's apartment pursuant to the warrant were the following items:

- a. a Glock 10mm handgun, bearing serial number VLH985, loaded with one round in the chamber and 14 rounds in the appropriately sized and inserted magazine,;
- b. a Smith and Wesson .40 caliber handgun, bearing serial number DWE3206, loaded with one round in the chamber and 11 rounds in the appropriately sized and inserted magazine;
- c. a black extended Glock .40 caliber magazine;
- d. a box containing 28 rounds of .40 caliber ammunition, and
- e. clothing items which appeared to match clothing worn by WEST in posts to the **SUBJECT ACCOUNT**.

1        23. On March 9, 2020, Brian Arnold, a Special Agent (SA) with the Bureau of  
2 Alcohol, Tobacco, Firearm, and Explosives (ATF) examined the Glock 10mm caliber  
3 handgun and the Smith and Wesson .40 caliber handgun that were seized from WEST's  
4 apartment. SA Arnold is a certified interstate nexus examiner who has received  
5 specialized training in identifying firearms and determining the location where firearms  
6 were manufactured. Based on his training and experience, SA Arnold determined that  
7 both handguns were firearms, within the meaning of Title 18, United States Code,  
8 Section 921(a)(3). He further determined that the Glock 10mm caliber handgun was  
9 manufactured in Austria, and the Smith and Wesson .40 caliber handgun was  
10 manufactured in Connecticut. As a result, the handguns must have traveled in or affected  
11 interstate and foreign commerce in order to be possessed in Washington and Montana.

12                    **TECHNICAL BACKGROUND REGARDING SNAPCHAT**

13        24. I have learned that Snapchat is a multimedia messaging application in  
14 which users can send photographs and videos to other users. The photograph or video  
15 will display for a limited amount of time to the recipient. The recipient can then opt to  
16 view the photograph or video a second time, and after this second viewing, the recipient  
17 cannot view the photograph or video again on the Snapchat application, and the  
18 photograph or video is deleted. From my training and experience, I know that Snap, Inc.  
19 maintains user data, to include photographs or videos on their servers, sometimes for one  
20 to three months, even though users are unable to access previously viewed photographs  
21 and videos.

22        25. On February 27, 2020, I served Snap, Inc. with a preservation request  
23 pursuant to 18 U.S.C. § 2703(f), requiring Snap, Inc. to preserve all information  
24 associated with the "squeeze10\_8" Snapchat account.

25        26. The Snapchat Law Enforcement Guide, published by Snap, Inc., and last  
26 updated September 21, 2018, states that "Snapchat is a mobile application made by Snap  
27 Inc. and available through the iPhone App Store and Google Play. The application  
28 provides a way to share moments with photos, video, and text." The Guide also lists some

1 of the information that is or may be available by way of valid process served on Snap Inc.

2 According to Snap Inc., this information includes, but is not limited to:

- 3 a. Basic subscriber information for the Snapchat account associated  
4 with the above listed accounts consisting of the email address, phone  
5 number, friends list, account creation date, and timestamps and IP  
6 address for account logins/logouts.
- 7 b. Logs, including sender, recipient, date, and time, concerning the  
8 previous Snaps sent to or from each of the above listed accounts.
- 9 c. All stored content associated with the above-listed accounts,  
10 including but not limited to; all pictures and videos, all stored Snaps,  
11 Stories, Memories, and chat content. All meta-data associated with  
12 user created content.
- 13 d. All stored location information associated with the above listed  
14 accounts, including but not limited to all geographic locations  
15 obtained through GPS, Bluetooth, WIFI signals, or any other means.

16 27. The Law Enforcement Guide defines the Snapchat features as follows:

- 17 a. **Snaps:** A user takes a photo or video using their camera phone in  
18 realtime and then selects which of their friends to send the message  
19 to. Unless the sender or recipient opts to save the photo or video, the  
20 message will be deleted from their devices (after the content is sent  
21 in the case of the sender and after it's opened in the case of the  
22 recipient). Users are able to save a photo or video they've taken  
23 locally to their device or to Memories, which is Snapchat's cloud-  
24 storage service.
- 25 b. **Stories:** A user can add photo or video Snaps to their "Story."  
26 Depending on the user's privacy settings, the photos and videos  
27 added to a Story can be viewed by either all Snapchatters or just the  
28 user's friends for up to 24 hours. Stories can also be saved in  
Memories.
- c. **Memories:** Memories is Snapchat's cloud-storage service. Users can  
save their sent or unsent Snaps, posted Stories, and photos and  
videos from their phone's photo gallery in Memories. A user can also  
edit and send Snaps and create Stories from these Memories. Snaps,  
Stories, and other photos and videos saved in Memories are backed  
up by us and may remain in Memories until deleted by the user.

1 d. **Chat:** A user can also type messages, send photos, videos, audio  
2 notes, and video notes to friends within the Snapchat app using the  
3 Chat feature. A user sends a Chat message to a friend, and once it is  
4 viewed by both parties - and both parties swipe away from the Chat  
5 screen - the message will be cleared. Within the Snapchat app itself,  
6 a user can opt to save part of the Chat by tapping on the message that  
they want to keep. The user can clear the message by tapping it  
again.

7 **BACKGROUND RELEVANT TO SOCIAL MEDIA AND FIREARMS**

8 28. Based on my training and experience, I know that individuals use social  
9 media services, such as Snapchat, Facebook, Instagram, and similar sites, to post  
10 photographs and videos of themselves in possession of firearms, and to communicate  
11 with the public, their associates, and their adversaries. Communication can take various  
12 forms, including pictures, videos, text, instant messaging, and emojis. Also, many social  
13 media services utilize GPS and Wi-Fi connectivity to determine the location of the user.  
14 Users can also share their location with other users through these applications.

15 29. In addition, I also know that prohibited persons such as WEST cannot  
16 legally acquire firearms from a firearms dealer due to the legal requirement for a  
17 background check. Accordingly, prohibited persons will instead acquire the firearms  
18 from other individuals. Evidence of their negotiations for the purchase and sale of  
19 firearms, in the form of text, chats, instant message, pictures, videos, and/or other  
20 messaging applications, can and often are found in social media accounts used by  
21 suspects.

22 30. Thus, in addition to pictures, videos, and messages that document a  
23 prohibited person's possession of firearms, the information stored by a social media  
24 service can reveal whom a prohibited person has communicated with regarding firearms,  
25 and how the prohibited person has acquired or disposed of firearms.  
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**INFORMATION TO BE SEARCHED AND ITEMS TO BE SEIZED**

31. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular Title 18, United States Code, Sections 2703(a), (b)(1)(A), and (c)(1)(A), by using the warrant to require Snap, Inc. to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

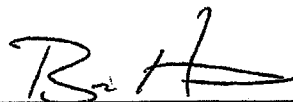
32. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Snap, Inc.

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**CONCLUSION**

33. Based on the foregoing, there is probable cause to believe that DESHAWN LAMAR WEST has unlawfully possessed firearms and that he has communicated about these offenses through his Snapchat account, "squeeze10\_8" (the **SUBJECT ACCOUNT**). Therefore, I believe that evidence of WEST's unlawful possession of firearms will be found in the **SUBJECT ACCOUNT**, as further described in Attachment A. I seek authority for the government to search all of the items specified in Section I of Attachments B, in order to seize all of the data, documents and records that are identified in Section II of Attachment B.



BENJAMIN HARRISON, Affiant  
Special Agent, FBI

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit on the 17th day of March, 2020.



THERESA L. FRICKE  
United States Magistrate Judge

**ATTACHMENT A**

**(Account to be Searched)**

This warrant applies to information associated with the Snapchat account  
“squeeze10\_8”, that is stored at premises owned, maintained, controlled or operated by  
Snap, Inc., headquartered at 2772 Donald Douglas Loop North, Santa Monica, CA  
90405.

**ATTACHMENT B-1**

**I. Section I - Information to be disclosed by Snap, Inc. for search:**

To the extent that the information described in Attachment A is within the possession, custody, or control of Snap Inc., regardless of whether such information is located within or outside of the United States, including any communications, records, files, logs, posts, payment records, or information that has been deleted but is still available to Snap, Inc., or has been preserved pursuant to requests made under 18 U.S.C. § 2703(f), Snap, Inc. is required to disclose the following information to the government for the Snapchat account identifier listed in Attachment A:

- a. Basic subscriber information for the Snapchat account “squeeze10\_8”, consisting of the email address, phone number, friends list, account creation date, means and source of payment (including any credit or bank account number), and timestamps and IP address for account logins/logouts.
- b. Logs, including sender, recipient, date, and time, concerning the previous Snaps sent to or from the above listed account.
- c. All stored content associated with the above listed account, including but not limited to; all pictures and videos, all stored Snaps, Stories, Memories, and chat content, and all meta-data associated with user created content.
- d. All stored location information associated with the above listed accounts, including but not limited to all geographic locations obtained through GPS, Bluetooth, WIFI signals, or any other means.

1 The Provider is hereby ordered to disclose the above information to the government  
2 within 14 days of service of this warrant.  
3

4 **II. Section II - Information to be seized by the government:**  
5

6 All information described above in Section I that constitutes fruits, evidence, and  
7 instrumentalities of violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of Firearms),  
8 involving DESHAWN LAMAR WEST, including, for the Snapchat account identified in  
9 Attachment A, information pertaining to the following matters:  
10

- 11 a. All messages, documents, and profile information, attachments, or other data that  
12 serves to identify any persons who use or access the "squeeze10\_8" Snapchat  
13 account, or who exercise in any way any dominion or control over the specified  
14 account;
- 15 b. Any posts, photographs, videos, messages, communications, or documents relating  
16 to firearms, or firearm-related items such as ammunition, magazines, gun parts,  
17 pistol grips, laser sights, or Glock conversion devices;
- 18 c. Identifying information, including the Snapchat username or address, for accounts  
19 and individuals who correspond with the "squeeze10\_8" Snapchat account about  
20 firearms, or firearm-related items.  
21
- 22 d. Location and date information and similar metadata associated with posts,  
23 photographs, videos, messages, communications, or documents relating to  
24 firearms, or firearm-related items.
- 25 e. All subscriber records associated with the specified account, including name,  
26 address, local and long distance telephone connection records, or records of  
27 session times and durations, length of service (including start date) and types of  
28 service utilized, telephone or instrument number or other subscriber number or

1 identity, including any temporarily assigned network address, and means and  
2 source of payment for such service) including any credit card or bank account  
3 number;

4  
5 f. any and all other log records, including IP address captures, associated with the  
6 specified account; and

7 g. any records of communications between Snap, Inc. and any person about issues  
8 relating to the account, such as technical problems, billing inquiries, or complaints  
9 from other users about the specified account. This to include records of contacts  
10 between the subscriber and the provider's support services, as well as records of  
11 any actions taken by the provider or subscriber as a result of the communications.  
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